

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CRIMINAL NO. <u>3:16-cr-30024-005-DRH</u>
	)	
JAMIE RAMON GREEN,	)	
	)	
Defendant.	)	

**STIPULATION OF FACTS**

Now comes, The United States of America, by Donald S. Boyce, United States Attorney for the Southern District of Illinois, and through Steven D. Weinhoeft, Assistant United States Attorney, who enters into the following Stipulation of Facts with the Defendant, **JAMIE RAMON GREEN**, and his attorney, pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3. The parties hereby stipulate and agree as follows:

1. **JAMIE GREEN** is a resident of Houston, Texas who was part of a group distributing drugs into the Midwest. The group would ship cocaine into Illinois while travelling together in a caravan of 4-5 vehicles from Texas. The lead vehicle would act as a lookout and alert the vehicles transporting the cocaine if there were police in the area. The lookout drivers were paid less than the drivers who actually transported the cocaine.

2. Individual #1 is a Houston-based cocaine distributor who directed the group to distribute cocaine to various areas, including to customers in the St. Louis metropolitan region. The group delivered cocaine and transported money in furtherance of the drug organization.

3. **NAHUM SHIBESHI** and **ASTIN ALLISON** are Houston drug distributors who had been supplying cocaine separately to their own network of customers in the St. Louis metropolitan area, which included O'Fallon, Illinois. **SHIBESHI**, **ALLISON** and **TERRANCE MILES** became

connected to Individual #1 and agreed to distribute Individual #1's cocaine to ALLISON and SHIBESHI's existing network of customers in the O'Fallon, Illinois, area.

4. Towards the end of November 2015, SAMMY MONROE, VICTOR JOHNSON, JAMIE GREEN, RODNEY SMITH, DANA BELL, and three other individuals traveled to the St. Louis area to deliver cocaine and transport cash for Individual #1. Part of this shipment included instructions to meet with TERRANCE MILES to supply him with three (3) kilograms of cocaine intended for ALLISON and SHIBESHI.

5. On December 2, 2015, MILES met with JAMIE GREEN and another individual at the Galleria Mall in St. Louis, Missouri, at which time GREEN delivered three (3) kilos of cocaine to TERRANCE MILES. Those kilos were sold on a "front," or consignment-type arrangement, where the buyer was not required to make payment at the time of delivery. MILES took the three (3) kilos back to O'Fallon where two (2) were immediately resold.

6. On December 3, 2015, TERRANCE MILES contacted VICTOR JOHNSON and complained that the third kilo was of poor quality. MILES asked to exchange it for a replacement kilo. MILES also agreed to pay for the two kilos that had already been sold when picking up the replacement kilo. At approximately 11:00 a.m., MILES appeared at the Galleria Mall in St. Louis to obtain the replacement kilo, as planned.

7. MILES was met at the Galleria by two cars travelling together, containing 5 people.

- a. The first car was a rented Dodge Journey. It was driven by an uncharged coconspirator. VICTOR JOHNSON was the front seat passenger and SAMMY MONROE was the back seat passenger.
- b. The second car was a rented Dodge Dart that contained the replacement kilo. JAMIE GREEN drove that second car. The replacement kilo was in a bag at RODNEY SMITH's feet as he rode in the front seat passenger.

Police interrupted the planned exchange in the parking lot of the Galleria and all present were arrested. VICTOR JOHNSON was in possession of a drug log that referenced customer and payment records for 19 kilograms of cocaine that were being sold for \$32,500 per kilo.

8. A probable cause search of the vehicles revealed the replacement kilo, along with a number of Drury Inn hotel room key cards. Agents also found other rental car keys, including keys for a grey Ford F-150 displaying Georgia registration BSG2774, registered to PV Holdings (Avis/Budget). The grey Ford F-150 was not present at the Galleria. Additional investigation led the agents to the Drury Inn located at Olive and I-270, in St. Louis. The front desk attendant identified the room keys and informed agents that DANA BELL had rented rooms 542, 558, 560 and 562.

9. Agents knocked on room 542 and located DANA BELL, who confirmed that she had in fact rented each of the four hotel rooms. She gave consent to search all 4 rooms. In Room 562 agents found a black suitcase containing \$508,330 in US Currency; two (2) kilos of cocaine; a small black duffle bag with RODNEY SMITH'S wallet and ID; and a small black stolen .38 caliber revolver.

10. Agents drove through the parking garage and located the grey Ford F-150 in the parking garage. Agents were aware that the individuals may also be in possession of a white Dodge Ram pickup truck – and they observed a vehicle matching this description parked two (2) parking stalls away from the grey Ford F-150. Next to the white Dodge Ram, they found a third black truck owned by a rental company. Agents called for a canine sniff. The canine alerted positive for the presence of narcotics on each of the rental vehicles providing additional cause to search. Agents conducted a probable cause search and found:

- a. **Black Dodge Ram Truck** - this vehicle was rented by VICTOR JOHNSON on November 30, 2015, and contained \$339,380 in US Currency concealed in the spare tire.
- b. **Grey Ford F-150** - this vehicle had been rented by Victor Johnson at the Houston, TX airport, and contained \$319,920 in US Currency concealed in the spare tire.
- c. **White Dodge Ram Truck** - this vehicle was rented by RODNEY SMITH on November 19, 2015, and no spare tire was present.

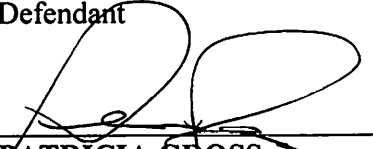
11. After his arrest, **GREEN** waived his *Miranda* rights and agreed to speak to agents. **GREEN** admitted that he was part of a group delivering cocaine from Texas to Illinois. He denied being a leader of the organization and characterized himself as "only a driver." He said that he was paid \$4,000 for making this particular trip. **GREEN** was then confronted with the fact that agents already knew that he had personally delivered three (3) kilos to TERRANCE MILES the night before his arrest. **GREEN** admitted making that delivery and said that the group had transported 10 kilos of cocaine. **GREEN** stated that he had made three (3) prior trips to St. Louis to deliver drugs.

UNITED STATES OF AMERICA

DONALD S. BOYCE  
United States Attorney

  
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**JAMIE RAMON GREEN**  
Defendant

  
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**STEVEN D. WEINHOFET**  
Assistant United States Attorney

  
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**PATRICIA GROSS**  
Attorney for Defendant

Date: 12-21-16

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